

Before the
Federal Communications Commission

Washington, D.C. 20554

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MAY - 3 1993

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In re Applications of

COMMUNITY TELEVISION OF
 SOUTHERN CALIFORNIA

VALLEY PUBLIC TELEVISION, INC.

For a Construction Permit for a New
 Noncommercial Educational Television
 Station to Operate on Channel *39 in
 Bakersfield, California

MM Docket No. 93-93

BRET-881012KE

BRET-900904KE

To: Administrative Law Judge
 Arthur I. Steinberg

MOTION TO ENLARGE ISSUES

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May 3, 1993

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SUMMARY OF ARGUMENT

Community Television of Southern California (CTSC) urges the Administrative Law Judge to add issues against Valley Public Television, Inc. (VPT) to determine (a) whether VPT had reasonable assurance that it was financially qualified when it filed its application in 1990 and certified that it was so qualified, (b) whether VPT is currently financially qualified, (c) whether VPT's employment practices at its Fresno station comport with the Commission's EEO rules and whether that affects VPT's qualification to hold this license, (d) whether VPT's application complies with the requirements of Section 1.1307(b) and, if not, whether an Environmental Impact Statement must be prepared, and (e) the center of radiation of VPT's proposed antenna, whether it is proposing a beam tilt antenna and the area and population it will serve with its proposed facilities.

With respect to the financial qualifications issues, VPT indicated in its application that it was financially qualified without regard to any grant from the Public Telecommunications Facilities Program (PTFP) of the National Telecommunications and Information Administration (NTIA). However, information VPT filed with NTIA raises substantial questions whether VPT had a reasonable assurance at the time it filed its application that it had current assets in excess of current liabilities sufficient to meet the construction and three month operating costs for its station. The information filed with NTIA also raises questions whether VPT currently has sufficient funds to satisfy the Commission's financial qualification requirements.

Similarly, VPT's Annual Employment Reports during the period from 1989 through 1992 indicate that its employment of Hispanics fall substantially below the FCC processing guidelines. During that period, VPT's employment of Hispanics overall has been about 25% of their representation in the workforce and the number of Hispanics in the upper-four job categories has been woefully inadequate. Its 1992 report indicates that it had no Hispanic employees in the upper four categories. Further, evidence in its 1988 renewal application and the employment data for the subsequent years indicate that VPT has not undertaken to "establish, maintain, and carry out a positive continuing program" to seek out and employ qualified Hispanic applicants, as required by Section 73.2080.

VPT's application also does not contain the showing required by Sections 1.1305 and 1.1307(b) that its proposal will not result in excessive RF radiation to workers and the public in the vicinity of its antenna. Rather, VPT relies solely on conclusory statements and engineering material filed by another station at the site, material which contains no reference to VPT's proposal.

Finally, information in VPT's application as to its proposed antenna is internally inconsistent and information as to the elevation of its site is inconsistent with other material on file with the Commission. VPT should be required to clarify this information so that accurate projections can be made of the areas and populations it proposes to serve.

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VALLEY PUBLIC TELEVISION, INC.)	
)	BRET-900904KE
)	
For a Construction Permit for a New)	
Noncommercial Educational Television)	
Station to Operate on Channel *39 in)	
Bakersfield, California)	

To: Administrative Law Judge
Arthur I. Steinberg

MOTION TO ENLARGE ISSUES

Pursuant to Section 1.229 of the Commission's rules,
Community Television of Southern California (CTSC), a party to
the above-captioned proceeding, hereby requests the
Administrative Law Judge to enlarge the issues against Valley
Public Television, Inc. (VPT) to include the following issues:

1. To determine whether at the time VPT filed its application it had a reasonable basis to believe that it was financially qualified to construct and operate its proposed station, as it certified in its application.
2. To determine whether VPT is currently financially qualified to construct and operate its proposed station.
3. To determine whether VPT's employment policies and practices comply with the requirements of Section 73.2080 of the Commission's rules, and, if not, whether VPT is qualified to hold the license for Channel *39 in Bakersfield.
4. To determine whether VPT's application complies with Sections 1.1305 and 1.1307(b) of the Commission's rules, and if not, whether an Environmental Impact Statement must be prepared.

5. To determine the center of radiation of VPT's proposed antenna, whether it is proposing to employ a beam tilt and the areas and populations it will serve with its proposed facilities.

I. VPT Did Not Have A Reasonable Basis to Believe It Was Financially Qualified When it Filed its Application and It Is Still Not Financially Qualified

Applicants for new broadcast facilities, whether commercial or noncommercial, are required to have sufficient current assets in excess of current liabilities to be able to construct and operate their proposed station for a period of three months without revenue. Reduction of the Information Required by Specified Application Forms, 52 R.R.2d 1362, 1364-65 (1982). While the Commission employs a somewhat more relaxed standard for noncommercial applicants than it does for commercial applicants, noncommercial applicants must nonetheless have a reasonable assurance that they have the required funds. See, NTA Television Broadcasting Corp., 22 R.R. 273, 291 (1961); Seattle Public Schools, 103 F.C.C.2d 862, 868 (1986). VPT cannot meet this standard and issues should be added to determine whether VPT had a reasonable assurance that it was financially qualified when it filed its application and whether it is currently financially qualified.

Noncommercial applicants are permitted to rely on matching grants from the Public Telecommunications Facilities Program (PTFP) of the National Telecommunications and Information Administration (NTIA) to meet a portion of their construction costs, KOED, Inc., 5 FCC Rcd 1784 (1990), and may similarly rely

on grants from other governmental entities or charitable organizations. Reduction of the Information Required by Specified Application Forms, supra.^{1/} Here, however, VPT has elected not to rely on such sources. Thus, its certification that it was financially qualified required that it have a reasonable assurance that it had current assets sufficient to cover the construction and operating costs for a period of three months. However, VPT's own contemporaneous filings with NTIA raise substantial questions whether it had that reasonable assurance.^{2/}

In that NTIA application, VPT indicated that its anticipated construction costs were approximately \$323,249. Since PTFP only funds the acquisition of electronic and related equipment,^{3/} VPT's estimate did not include any operating costs or the costs of prosecuting its application, including attorney's fees. Since VPT has proposed to lease its transmitter site and tower facilities,^{4/} those costs must be added to the construction estimates, as must utility costs, licensed personnel to monitor the station, etc. Even assuming that the operating costs are

^{1/} Where applicants are relying on such funding sources, they are required to so indicate such in their applications. See FCC Form 340, Section III, ¶3.

^{2/} While VPT indicated that its financial qualifications were not dependant on an NTIA grant, it filed an application with NTIA seeking matching funds. See 54 Fed. Reg. 13140 (File No. 89039).

^{3/} See 15 C.F.R. §2301.4. The PTFP program does not provide

relatively nominal and in the range of \$5,000 per month, VPT was required to have current assets in excess of current liabilities of approximately \$340,000 to be able to certify that it was financially qualified.^{5/}

VPT represented in its NTIA application, however, that as of the end of 1987 it had cash reserves of only \$160,836 (see, Attachment A, p. 17), only 50% of its estimated construction costs and 47% of its construction and three month operating costs. Similarly, the supplement to that application which VPT filed with NTIA this year, indicates that its cash reserves were as follows during the period from 1987 through last year:

1987-88	\$ 253,586
1988-89	\$ 253,352
1989-90	\$ 253,360
1990-91	\$ 160,365
1991-92	\$ 201,281

(See Attachment B, p. 12). Accordingly, it is clear that, even assuming VPT intended to devote all of its cash reserves to its Bakersfield project (a proposal of questionable financial wisdom), VPT did not have, at the time it filed its initial

^{5/} As indicated in the attached Declaration of Judith C. Collinge, Controller of CTSC, CTSC estimates that its monthly operating costs for its proposed station will equal between \$13,000 and \$15,000 per month. Those estimates include rental costs of \$2500 for the transmitter and antenna, \$1500 per month for utilities, and \$7,500 for licensed engineers to monitor the stations operations and perform such maintenance and repair as may be necessary. See Declaration of Judith C. Collinge attached as Attachment C. Accordingly, CTSC's assumption of a \$5,000 per month operating cost probably underestimates the amount VPT will be required to expend.

application, a reasonable assurance that it had assets to construct and operate the station for three months.^{6/}

It is also clear that VPT does not have, and at no point since its application was filed did it have, sufficient funds to meet the Commission's financial requirements. VPT's 1993 NTIA Supplement also indicated that VPT now estimates its construction costs will equal \$336,843, increasing its total financial requirement to approximately \$350,000. Since its current cash reserves are only \$201,281, it does not have sufficient current assets to cover the construction costs and three month operating expenses.^{7/}

Indeed, VPT admitted as much in its NTIA application. It stated that it proposed to raise the matching funds required to obtain an NTIA grant -- in the amount of approximately \$96,000 -- through a "Capital Campaign Drive"^{8/} and that it was "prepared to fully fund the matching share and the long-term operational costs needed for this and other projects, through traditional

^{6/} It is also questionable whether VPT plans to rely on those reserves since VPT indicated in its NTIA application that it intends to rely on other sources. See pp. 5-6, infra.

^{7/} VPT's NTIA application indicates that between 1989-90 and 1990-91 it used approximately \$90,000 of its cash reserves to purchase stereo equipment. If VPT was required to finance that acquisition from its cash reserves, it presumably was also required to use those reserves to finance the cost of its recently constructed translator station in Bakersfield. As a result, its available cash reserves would appear to be substantially less than the approximately \$200,000 indicated in the NTIA application.

^{8/} VPT has not submitted any showing that it has the ability to successfully complete such a drive.

public television pledge campaigns, direct mail, auction and special projects." (See Attachment A, p. 14).^{9/} Accordingly, by its own admission, VPT in 1989 did not have the funds necessary to meet NTIA's matching requirement -- an amount equal to 30% of its estimated construction costs -- without regard to the full construction and operating expenses.^{10/}

Similarly, in its current NTIA application, VPT states that "[f]unding for this project would be secured through public matching solicitations, and/or from the Station's operational budget." See Attachment B, p. 13. However, nowhere in that application does VPT show that it can raise the \$375,000 through public solicitations or from its operating budget. To the contrary, VPT's NTIA application indicates that VPT's operating surplus is only a small fraction of that amount.

In light of these facts, substantial questions exist whether VPT had a reasonable assurance at the time it executed its certification that it had the required financial resources, see,

^{9/} In its 1993 NTIA application, VPT has increased its estimated costs of construction to \$363,843 and indicated that it intends to meet the matching requirements of the PTFP program through a cash contribution of \$117,895. While the application indicates that VPT has the cash reserves to make that contribution, that contribution only covers 35% of the construction costs and none of the operating costs or the costs of pursuing its application. Thus, even under its current proposals, it lacks sufficient funds to certify that it is financially qualified.

^{10/} It should also be noted that under established NTIA policies, NTIA will normally only grant 50% of the construction costs, 52 Fed. Reg. 31496, 31497 col. 1-2 (Aug. 20, 1987), not the 70% initially sought by VPT or the 60% it is currently seeking.

e.g., Aspen FM, Inc., 68 R.R.2d 1635, 1637-38 (1991); Marlin Broadcasting of Central Florida, Inc., 5 FCC Rcd 5751 (1990); Northampton Media Associates, 4 FCC Rcd 5517, 5518-19 (1989), and an issue should be added to permit those questions to be explored in a hearing. See Weyburn Broadcasting Ltd. Partnership v. FCC, 984 F.2d 1220 (D.C. Cir. 1993).

Similarly, since VPT's current NTIA application raises comparable questions whether it has the approximately \$375,000 it will need to satisfy the Commission's financial qualifications requirements, an issue should also be added as to VPT's current financial qualifications. See, Coast TV, 68 R.R.2d 972 (Rev. Bd. 1990)(financial qualifications issue raised by private offering memorandum circulated by applicant that indicated applicant may not have the required financing.) That is true even under the more relaxed standards applied to noncommercial applicants. See, e.g., Seattle Public Schools, supra, (financial qualifications issue added against noncommercial applicant where available funds were not sufficient to cover costs): City of New York Municipal

II. VPT's Employment Practices Do Not Comply With the Commission's EEO Rules

Section 73.2080(b) of the Commission's Rules requires licensees to "establish, maintain, and carry out a positive and continuing program of specific practices designed to ensure equal opportunity in every aspect of station employment policy and practice." It is apparent from the records on file at the Commission that VPT has failed to maintain an effective Equal Employment Opportunity Program for the recruitment and hiring of Hispanic employees at its Fresno station. Accordingly, an issue should be added to examine the facts and circumstances surrounding the performance of its EEO Program and the effects thereof on VPT's qualifications.

The deficiency of VPT's EEO Program is demonstrated by the station's failure to meet the FCC's 50% of parity processing guidelines.^{11/} Based on 1980 Census data figures for the Fresno, California, work force,^{12/} the 50% of parity benchmark for

^{11/} Reliance upon the FCC's statistical guidelines is one way to evaluate the effectiveness of a station's EEO Program by comparing the percentage of minority hires during the relevant period to the percentage of minorities in the applicable labor force. Equal Employment Opportunity in the Broadcast Radio and Television Services, 2 FCC Rcd. 3967, 3974 (1987) (subsequent history omitted). While the Commission compares the overall number of minority employees with the total relevant minority labor force, it places particular emphasis on a station's efforts with respect to the dominant minority in the workforce. D.W.S., Inc., 7 FCC Rcd 7170 (1992). In the case of both Fresno and Bakersfield, Hispanics are dominant minority. According to the 1980 Census data, Hispanics constituted 19.9% of the work force in the Bakersfield (P)MSA and, in 1990, the percentage of Hispanics rose to 25.1%.

^{12/} See 1980 Census Data Summary Report (P)MSA Total Percentages for Total Employed Civilian Labor Force.

Hispanics in the Fresno area is 12.7%, that is, 50% of a 25.4% representation of Hispanics in the Fresno work force. However, since the filing of its last renewal application in 1988,^{13/} the

Despite the substantial number of Hispanics in the local work force and the few Hispanics employed on a full-time basis at the station, VPT has been doing little to recruit Hispanic employees. Based on available documentation in the station's August 1, 1988, renewal application and associated EEO Program Report (FCC Form 396), during the 12-month period preceding the filing of the renewal, the station used only one obvious Hispanic recruitment source -- El Concilio DeFresno, Inc.^{17/} No other Hispanic recruitment sources were reflected. Moreover, during the 12-month period preceding the filing of the VPT renewal, no minorities were hired at all by the station for upper-four positions and no existing minority employees were promoted to any station position.^{18/} Finally, VPT's failure to increase the number of Hispanics employed at the station during the past four years, including its failure to employ any additional Hispanics in the upper-four job categories, raises serious questions

^{16/} (...continued)

Census Data Summary Report (P)MSA Total Percentages for Total Civilian Labor Force for the Fresno, California, (P)MSA -- the required benchmark is 16.35% for Hispanics (or 50% of 32.7% Hispanics in the Fresno labor force). VPT's figures for Hispanics employed in its total full-time and upper-four work force during these three years almost never reached even half of the 16.35% benchmark.

^{17/} In its EEO program, VPT did list an entity called "OJT" as a training program. This program may be Hispanic; however, it was not so identified. In fact, it is impossible to know what type of program it is by its acronym which is all the information VPT filed.

^{18/} Although the renewal reflects that 17 minorities were referred to the station for job openings and two were actually hired, there is no indication in the renewal that any of these minorities were Hispanic.

1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

2. Once the problem is identified, the next step is to define the objectives and goals of the project. This helps to clarify what needs to be achieved and provides a clear direction for the team.

3. The third step is to develop a plan or strategy to address the problem. This involves breaking down the problem into smaller, manageable tasks and determining the resources needed to complete each task.

4. The fourth step is to implement the plan. This involves assigning tasks to team members, setting deadlines, and monitoring progress. It is important to communicate regularly and provide support to team members throughout the process.

5. The final step is to evaluate the results of the project. This involves comparing the actual outcomes to the objectives and goals defined at the beginning. It is important to identify any areas for improvement and learn from the experience for future projects.

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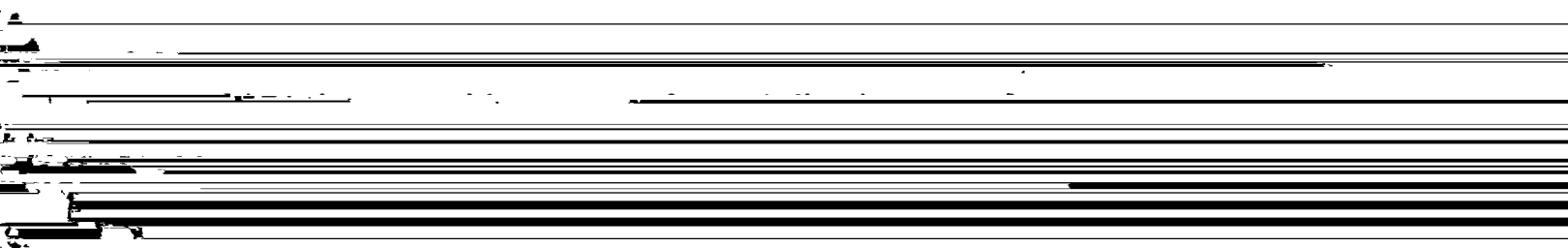
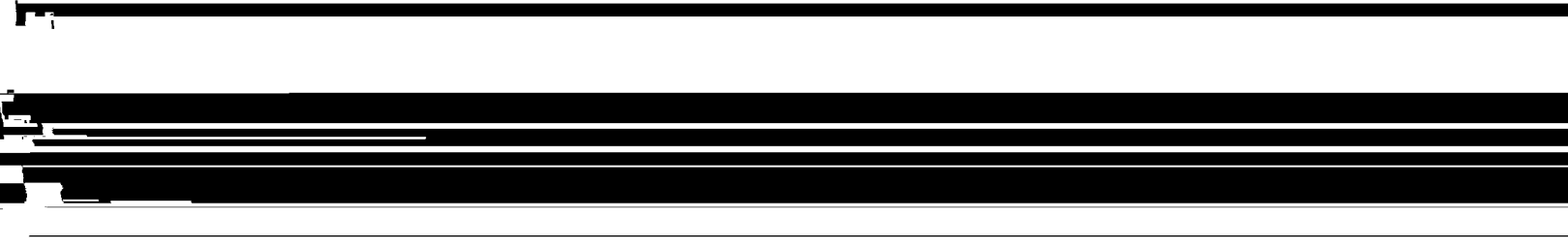
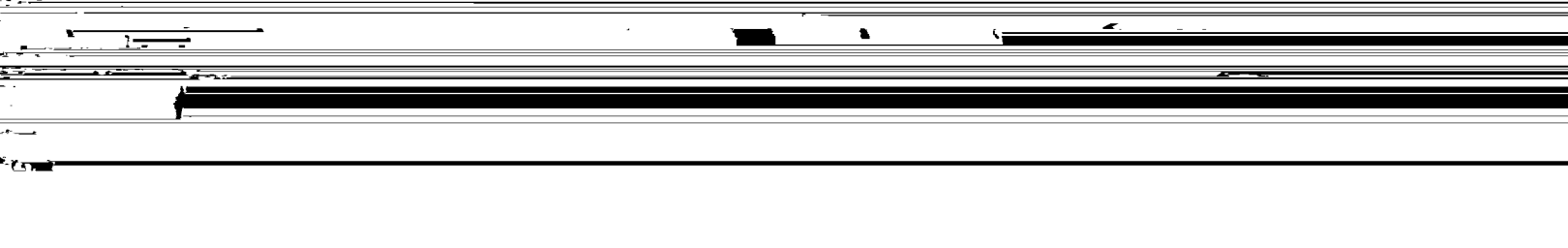
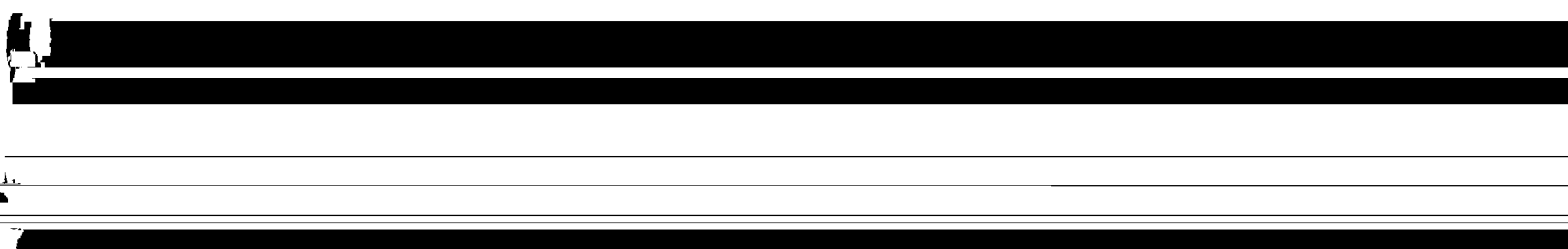
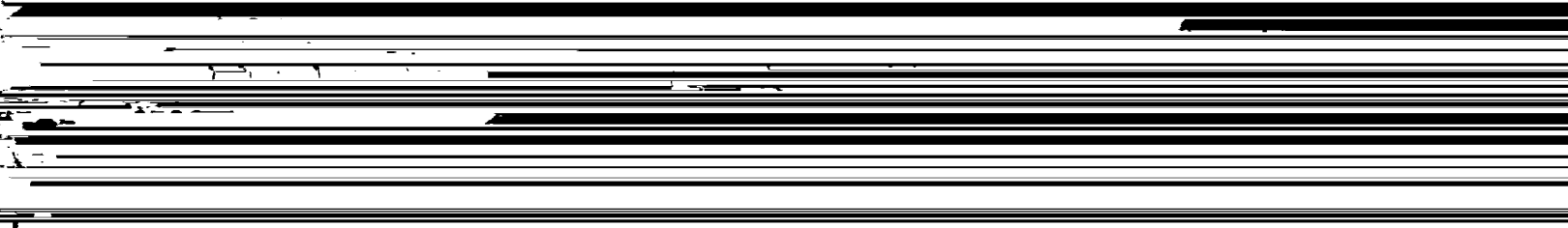
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III. VPT's Application Does Not Comply With the Commission Environmental Rules

Sections 1.1305 and 1.1307(b) of the Commission's rules requires broadcast applicants to demonstrate that the operation of their proposed facilities will not "cause exposure to radiation of workers or the general public of levels of radiation in excess of the 'Radio Frequency Protection Guides'" recommended by the American National Standards Institute. 47 C.F.R. §1.1307(b). Applicants are required to certify that they comply with these standards and to provide the Commission with the basis on which they have so certified. See FCC Form 301, Section V-C, ¶20. If they cannot show that they comply with the ANSI standards, they are required to submit an environmental assessment and the Commission must prepare an Environmental Impact Statement. Where the applicant is involved in a comparative hearing, the Environmental Impact Statement must be considered among the comparative criteria. Richardson Broadcasting Group, 5 FCC Rcd 5285, 5288-90 (1990).

The information supplied by VPT in response to Section V-C, ¶20 does not satisfy the Commission's requirements: it does not provide a sufficient basis to support its claim that workers and others will not be exposed to excessive RF radiation, nor does it set forth the procedures VPT will employ to assure that those working in and around the antenna will be protected. The lack of data as to how VPT determined that no environmental hazard exists is particularly crucial here since VPT's antenna will be mounted only 11.55 meters above ground, which is abnormally close to the

ground. Thus, VPT's operation is more likely to cause excessive



present. See, Evaluating Compliance with FCC Specified Guidelines for Human Exposure to Radiofrequency Radiation, OST Bulletin No. 65 (October 1985) at p. 24-26. Thus, the introductory material in this response only increases the necessity for a comprehensive examination of the radiation situation at the site.

Further, VPT makes no provision for the manner in which VPT plans to protect its employees and others who are working at the transmitter site. Initial installation, maintenance, repair and painting requirements all necessitate that humans climb the antenna towers and frequent the transmitter site. The closer a human comes to the antenna itself and to other RF radiators, the greater the risk that the Commission imposed safety standards will be exceeded. Given the low elevation at which VPT will mount its antenna, there is a substantially increased risk that excessive radiation will occur at ground level as well as when humans are required to climb adjacent tower. However, VPT has not specified the precautions that it will take to ensure that these individuals are protected against radiation hazards, as required by the Commission's rules See OST Bulletin, supra at pp. 28-29.

While VPT attempted to cure these inadequacies in an amendment filed on November 22, 1991, the additional material still falls far short of Commission requirements. The Amendment consists of a statement concerning compliance with Section 1.1305

filed by the licensee of Station KERO-TV, the tower owner.^{20/} No reference is made, however, to VPT's proposed station, even though the new entrant is responsible for "evaluating the RF environment." Id. at 25; Report and Order in Gen. Docket No. 79-144, supra. Consequently, the statement is grossly inadequate to comply with Section 1.1305.

For these reasons, an issue should be specified to determine the nature and extent of the radiation hazard posed by VPT's proposal, whether its proposal complies with Section 1.1305 and 1.1307(b), and, if not, whether an Environmental Impact statement must be prepared with respect to VPT's application. See, Richardson Broadcasting Corp, 3 FCC Rcd 5453 (1988)(Hearing Designation Order).

IV. VPT's Engineering Proposal Is Internally Inconsistent, and Is Inconsistent with Information on File With the Commission

As noted earlier,^{21/} VPT's application is internally inconsistent in that it is unclear whether it proposes to operate with or without a beam tilt. It is also inconsistent with information on file with the Commission. As a result, it is not possible to predict with a degree of accuracy the areas and populations which VPT will serve with its proposed facilities. Accordingly, an issue should be specified requiring VPT to

^{20/} It is not clear from VPT's application and its NTIA material which tower VPT plans to use. Its FCC application implies that VPT is proposing to mount its antenna on the KERO tower, while its NTIA application states that it will use the Station KFTV-TV tower. See Attachment A, p. 16.

^{21/} See footnote 20, supra.

clarify its engineering proposal and correct these inaccuracies so that a valid assessment can be made of the areas and populations it will serve.

VPT's response to Section V-C, ¶10 indicates that it will employ a 2° electrical beam tilt, but the antenna pattern shown in Exhibit No. 5 is for an antenna without any beam tilt. Accordingly, a question exists as to the technical configuration VPT plans to employ. Similarly, the elevation of VPT's proposed site is not clear and consequently the center of radiation of VPT's proposed antenna is uncertain. In its application, VPT indicates that it will locate its transmitter on a tower owned by Station KERO-TV and specifies that the height of the site above mean sea level is 2300 meters. It proposes to mount its antenna 12 meters above ground, giving it a center of radiation of 2312 meters. However, in its application for television translator Station K65EY, VPT indicated that the height of the site above mean sea level is 2282 meters and that the center of radiation of its antenna was 2294 meters, some 18 meters lower. See BPTT-8912084Q, Section V-C; ¶5. That is a change in elevation of 18 meters in the elevation of the site and the center of radiation.^{22/}

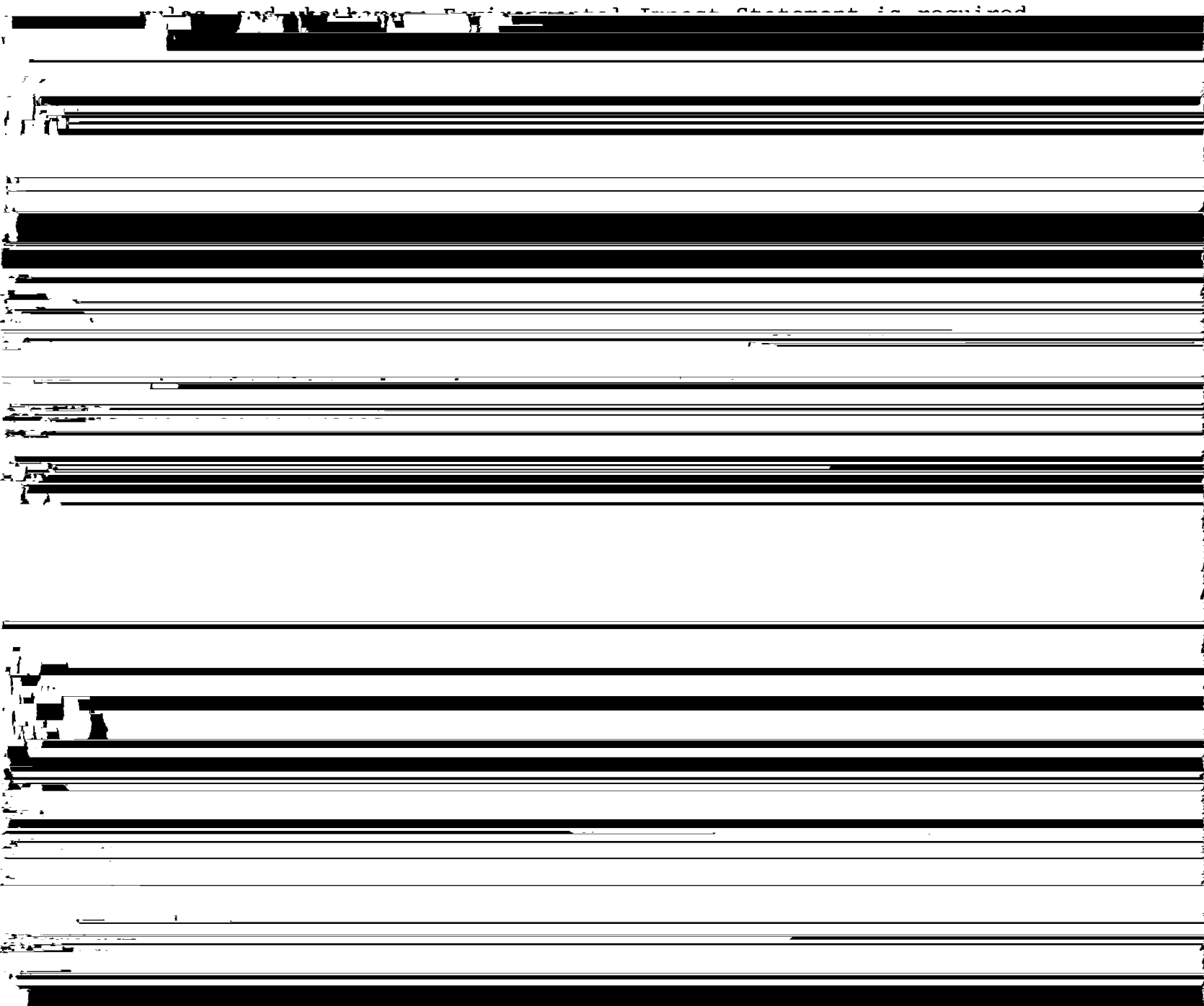
Since these discrepancies directly and materially affect the contours of the proposed station, they also effect the areas and populations to be served by VPT. Accordingly, an issue should be

^{22/} Station KERO-TV's engineering material on file with the Commission indicates that the height above ground at the site is 7,485 feet or 2281.4 meters. See Attachment D.

added to clarify this uncertainty and to establish a valid basis for determining the areas and populations which VPT will serve.

Conclusion

For the reasons set forth above, the Administrative Law Judge should add the requested issues to determine VPT's financial qualifications, compliance with the Commission's EEO rules and whether an Environmental Impact Statement is required



ATTACHMENT A

Excerpts from 1989 Application of
Valley Public Television, Inc.*
for a PTFP Grant from NTIA

* Formerly, KMTF Channel 18, Inc.



A-1

KMTF

PUBLIC TELEVISION FOR THE SAN JOAQUIN VALLEY
733 L Street • Fresno, California 93721 • (209) 266-1800

Colin Dougherty, General Manager

DATE RECEIVED

February 1, 1989

FEB 06 1989

Public Telecommunications and
Information Administration
Department of Commerce / NTIA
14th and Constitution Avenue NW, Room 4625
Washington, D.C. 20230

Attention: Tom Hardy

RE: PTFP Grant Application #: 9039 CTB

Enclosed are two copies of the notification of receipt of license application from the Federal Communications Commission pertaining to KMTF's application for Channel 39 in Bakersfield, California.

This is being submitted as a part of KMTF Channel 18, Inc.'s application for federal assistance through PTFP for a grant for the construction of the transmitter for Channel 39.

Please make the proper notation of our FCC Application # in our grant request packages. The FCC # is: 881230KG.

Two copies were enclosed to coincide with the two sets of papers submitted to your office for the grant.

Sincerely,

Colin Dougherty
General Manager

CD:cjr

KMTF Channel 18, Inc.
BOARD OF DIRECTORS
William M. Lyles, Chairman

THIS IS TO NOTIFY YOU OF RECEIPT ON
12/30/88 OF APPLICATION FOR

CONSTRUCTION PERMIT

CHANNEL: : CHAN-39

LOCATION: BAKERSFIELD, CA

THIS NOTIFICATION DOES NOT IMPLY
ACCEPTANCE FOR FILING OR GRANT.

ALL FUTURE INQUIRES SHOULD REFER TO
APPLICATION NUMBER: 881230KG

FCC 372 (7/87) NOTIFICATION

FEDERAL COMMUNICATIONS
COMMISSION
WASHINGTON, D.C. 20554

OFFICIAL BUSINESS

PENALTY FOR PRIVATE USE \$300



POSTAGE AND FEES PAID
FEDERAL COMMUNICATIONS
COMMISSION
FCC 615

KMTF CHANNEL 18, INC.
881230KG EDUCATIONAL TV STATION
C/O 733 "L" STREET
FRESNO, CA 93721



A-2

FEDERAL ASSISTANCE		2. APPLICANT'S APPLICATION IDENTIFIER		3. STATE APPLICATION IDENTIFIER	
1. TYPE OF SUBMISSION (Mark appropriate box) <input type="checkbox"/> NOTICE OF INTENT (OPTIONAL) <input type="checkbox"/> PREAPPLICATION <input checked="" type="checkbox"/> APPLICATION		a. NUMBER b. DATE Year month day 19		a. NUMBER b. DATE ASSIGNED Year month day 19	
4. LEGAL APPLICANT/RECIPIENT a. Applicant Name KMTF Channel 18, Inc. b. Organization Unit KMTF-TV c. Street/P.O. Box 733 L Street d. City Fresno e. County Fresno f. State California g. ZIP Code 93721 h. Contact Person (Name & Telephone No.)		5. EMPLOYER IDENTIFICATION NUMBER (EIN) 6. PROGRAM (From CFDA) a. NUMBER 1 1 * 5 5 0 b. TITLE PUBLIC TELECOMMUNICATIONS FACILITIES PROGRAM			
7. TITLE OF APPLICANT'S PROJECT (Use section IV of this form to provide a summary description of the project.) <input type="checkbox"/> BROADCAST RADIO <input checked="" type="checkbox"/> BROADCAST TV <input type="checkbox"/> NON-BROADCAST <input type="checkbox"/> OTHER (SPECIFY) <input type="checkbox"/> CONSTRUCTION PROJECT <input type="checkbox"/> PLANNING PROJECT TO: <input type="checkbox"/> Establish facilities for <input type="checkbox"/> First <input type="checkbox"/> Additional Service <input type="checkbox"/> Extend existing delivery system <input type="checkbox"/> Improve existing station facilities <input type="checkbox"/> Augment existing station facilities		8. TYPE OF APPLICANT/RECIPIENT A—State G—Special Purpose District B—Interstate H—Community Action Agency C—Substate I—Higher Educational Institution D—County J—Indian Tribe E—City K—Other (Specify): F—School District Public Broadcasting Station Enter appropriate letter <input checked="" type="checkbox"/> K			
9. AREA OF PROJECT IMPACT (Names of cities, counties, states, etc.) Bakersfield and Kern County, California		10. ESTIMATED NUMBER OF PERSONS BENEFITING Current 1 mill. First 426,000		11. TYPE OF ASSISTANCE A—Basic Grant D—Insurance B—Supplemental Grant E—Other C—Loan Enter appropriate letter(s) <input checked="" type="checkbox"/> A <input checked="" type="checkbox"/> A	
12. PROPOSED FUNDING a. FEDERAL \$ 226,274.00 b. APPLICANT 96.975.00 c. Total \$ 323,249.00		13. CONGRESSIONAL DISTRICTS OF: a. APPLICANT 14th 17th 15th 18th b. PROJECT 20th 17th 15. PROJECT START DATE Year month day Est. 19 89 3 1 16. PROJECT DURATION 6 Months 18. DATE DUE TO FEDERAL AGENCY 19 89 1 11		14. TYPE OF APPLICATION A—New C—Revision E—Augmentation B—Renewal D—Continuation Enter appropriate letter <input type="checkbox"/>	
19. FEDERAL AGENCY TO RECEIVE REQUEST PTFP/NTIA/DOC. Washington, D.C. 20230		a. ORGANIZATIONAL UNIT (IF APPROPRIATE) Public Tele-communications Facilities Program b. ADMINISTRATIVE CONTACT (IF KNOWN) Tom Hardy		20. EXISTING FEDERAL GRANT IDENTIFICATION NUMBER N/A	
c. ADDRESS DOC/NTIA, 14th and Constitution Avenue NW, Room 4625 Washington D.C. 20230		21. REMARKS ADDED <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
22. THE APPLICANT CERTIFIES THAT: To the best of my knowledge and belief, data in this preapplication/application are true and correct, the document has been duly authorized by the governing body of the applicant and the applicant will comply with the attached assurances		a. YES, THIS NOTICE OF INTENT/PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON: DATE December 30, 1988 Calif. Office of Planning & Research 1400 Tenth Street-Sacramento, CA b. NO, PROGRAM IS NOT COVERED BY E.O. 12372 <input type="checkbox"/>			

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